



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JAM  
F.#2017R01195

*271 Cadman Plaza East  
Brooklyn, New York 11201*

January 22, 2018

By FedEx and ECF

Steve Zissou, Esq.  
42-40 Bell Boulevard  
Suite 304  
Bayside, New York 11361

Re: United States v. Zoobia Shahnaz  
Criminal Docket No. 17-690 (JS)

Dear Mr. Zissou:

Enclosed please find the government's second discovery production in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The government also requests reciprocal discovery from the defendant.

Specifically, the government is providing the following materials, which have been marked as either "sensitive" or "highly sensitive" under the terms of the Stipulation and Protective Order issued on January 5, 2018:

- Capital One records, Bates numbered ZS-0000556-676, marked "highly sensitive"
- Citibank records, Bates numbered ZS-0000436-555, marked "highly sensitive"

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE  
Acting United States Attorney

By: /s/ Artie McConnell  
Artie McConnell  
Assistant U.S. Attorneys  
(631) 715-7825

Enclosures (ZS-0000436-676)

cc: Clerk of the Court (JS) (by ECF) (without enclosures)